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Attorneys for Motors Liquidation Company GUC Trust

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

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In re : Chapter 11 Case No.

MOTORS LIQUIDATION COMPANY, et al., : 09-50026 (REG)

f/k/a General Motors Corp., et al.

Debtors. : (Jointly Administered)

; -----**v**

CERTIFICATE OF NO OBJECTION RECEIVED AS TO MOTORS LIQUIDATION COMPANY GUC TRUST'S OBJECTION TO PROOF OF CLAIM NO. 48499 FILED BY NIAGARA MOHAWK POWER CORPORATION

The Motors Liquidation Company GUC Trust (the "GUC Trust"), formed by the above-captioned debtors (collectively, the "Debtors") in connection with the Debtors' Second Amended Joint Chapter 11 Plan, dated March 18, 2011 (as may be amended, modified or supplemented from time to time, the "Plan"), submits this certificate pursuant to the Sixth Amended Order Pursuant to 11 U.S.C. § 105(a) and Fed. R. Bankr. P. 1015(c) and 9007 Establishing Notice and Case Management Procedures (the "Case management Order") (ECF. No. 10183), and respectfully represents:

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1. On February 1, 2013, the GUC Trust filed the *Motors Liquidation*

Company GUC Trust's Objection to Proof of Claim No. 48499 filed by Niagara Mohawk Power

Corporation (the "Claim Objection") (ECF No. 12306).

2. The deadline for filing a response to the Claim Objection was February 27,

2013 at 4:00 p.m. (Eastern Time). A hearing on the Claim Objection has been scheduled for March

6, 2013 at 9:45 a.m. (Eastern Time).

3. To date, no response to the Claim Objection has been filed on the docket.

Additioanly, no party has indicated to the GUC Trust that it intends to oppose the relief requested in

the Claim Objection.

4. An electronic copy of a proposed order (the "**Proposed Order**") that is

substantially in the form of the proposed order that was annexed to the Claim Objection will be

submitted to the Court, along with this certificate.

5. Pursuant to the Case Management Order, the GUC Trust respectfully requests

that the Proposed Order be entered without a hearing.

Dated: New York, New York

March 4, 2013

/s/ Joseph H. Smolinsky

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